

1 NICOLA T. HANNA
United States Attorney
2 LAWRENCE S. MIDDLETON
Assistant United States Attorney
3 Chief, Criminal Division
STEVEN R. WELK
4 Assistant United States Attorney
Chief, Asset Forfeiture Section
5 JOHN J. KUCERA (Cal. Bar 274184)
Assistant United States Attorney
6 Asset Forfeiture Section
1400 United States Courthouse
7 312 North Spring Street
Los Angeles, California 90012
8 Telephone: (213) 894-3391
Facsimile: (213) 894-0142
9 E-mail: John.Kucera@usdoj.gov

10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.

No. CV 18-8423-RGK

**NOTICE OF ERRATA TO THE
REAL PROPERTY LOCATED IN MARICOPA
COUNTY, ARIZONA (PV 1)**

18 \$404,374.12 IN BANK FUNDS
SEIZED FROM NATIONAL BANK OF
19 ARIZONA ACCOUNT '0178;
\$1,925.80 IN BANK FUNDS SEIZED
20 FROM NATIONAL BANK OF ARIZONA
ACCOUNT '0151; \$613,573.28 IN
21 BANK FUNDS SEIZED FROM
NATIONAL BANK OF ARIZONA
22 ACCOUNT '3645; \$260,283.40 IN
BANK FUNDS SEIZED FROM
23 NATIONAL BANK OF ARIZONA
ACCOUNT '6910; \$64,552.82 IN
24 BANK FUNDS SEIZED FROM OR
FROZEN IN ASCENSUS BROKER
25 SERVICES '4301; AND \$56,902.00
IN BANK FUNDS SEIZED FROM OR
26 FROZEN IN ASCENSUS BROKER
SERVICES '8001,

27 Defendants.
28

1 PLEASE TAKE NOTICE of the following errata in the first amended
2 civil forfeiture complaint filed October 5, 2018 (Dkt. No. 11):

3 1. Under the Heading ASSETS HELD BY OR FOR THE BENEFIT OF
4 MICHAEL LACEY, paragraph "4.r." was misplaced. That paragraph
5 should have been included in the section headed, "ASSETS HELD BY OR
6 FOR THE BENEFIT OF JAMES LARKIN," which section presently begins at
7 paragraph "4.t.";

8 2. Under the section headed, "MICHAEL LACEY ASSETS," which
9 section presently begins at paragraph 53, sub-paragraph "M" was
10 misplaced. That sub-paragraph should have been included in the
11 section headed, "JAMES LARKIN ASSETS," which section presently
12 begins at paragraph 77; and

13 3. The section headed, "JAMES LARKIN ASSETS," present
14 paragraph 77 contains inaccurate information. Paragraph 74
15 presently reads,

16 Approximately \$11,480,000 million in illicit funds from
17 Backpage's U.S. Bank account '1165 passed-through various
18 Backpage or Backpage Operators accounts, eventually (between
19 March 15 and September 18, 2014) ending up in BMO Harris
20 account '5263, owned or controlled by Lacey. Thereafter, on
21 March 30, 2015, BMO Harris Bank account '5263 transferred
22 \$774,379.46 towards the purchase of the Paradise Valley
23 Property 1.

24 / / /

25 / / /

1 Instead, paragraph 74 should read,

2 Approximately \$41.5 million in illicit funds from
3 Backpage's U.S. Bank account '1165 passed through various
4 Backpage or Backpage Operators accounts. Following these
5 various transfers, eventually, on October 2, 2013, a total
6 of approximately \$26,130.64 was transferred into BMO
7 Harris account '3110, owned or controlled by Larkin.
8 Thereafter, on December 11, 2014, BMO Harris Bank account
9 '3100 paid \$46,957.28 to maintain the Paradise Valley
10 property 1.

11 Dated: October 9, 2018

12 Respectfully submitted,

13
14 NICOLA T. HANNA
15 United States Attorney
16 LAWRENCE S. MIDDLETON
17 Assistant United States Attorney
18 Chief, Criminal Division
19 STEVEN R. WELK
20 Assistant United States
21 Chief, Asset Forfeiture Section

22
23 /s/John J. Kucera
24 JOHN J. KUCERA
25 Assistant United States Attorney

26
27 Attorneys for Plaintiff
28 UNITED STATES OF AMERICA